**Richard Bernhardt, Managing Director**

**Bernhardt Communications Company**

1142 Kentwood Avenue

Cupertino, CA  95014-5808

Thursday, August 3rd,, 2017

Marlene H. Dortch, Secretary

Chairman Pai and FCC Commissioners Clyburn and O’Rielly

Federal Communications Commission

445 12th Street, SW

Washington, D.C. 20554

Re:  **Docket Number RM-11791 – Comments in Support of Petition for Rulemaking to Amend and Modernize Part 25 and 101 of the Communications Rules to Authorize and Facilitate the Deployment of Licensed Point-to-Multipoint Fixed Wireless Broadband Service in 3700-4200 MHZ Band - By Bernhardt Communications Company**

Dear Chairman Pai and Honorable Commissioners:

All too often when “wireless” or “broadband” is mentioned, the thought goes to mobile or cellular telecommunications providers.  While these industries do provide such services, in many parts of America, especially rural and suburban areas, services including Internet data, voice, and video are served by Wireless Internet Service Providers (WISPs).  Mobile and cellular providers have chosen in many these areas not to provide the full services that Americans need and want.  Fixed wireless providers using point-to-multipoint solutions can well serve these areas and beyond **affordably and effectively**.

**Needs in America for Rural and Suburban Broadband Services are Vast and the Demand High and Unmet - Fixed Wireless Can be Deployed Rapidly and Cost Effectively**

With extensive needs in this country for broadband services beyond our major cities, **more spectrum is needed now** and for the future to effectively, rapidly, and efficiently serve millions of customers who are underserved or not served at all.  WISPs (fixed wireless providers) already serve millions of rural and suburban residents and businesses and can deploy even more effectively and with excellent services if they have added spectrum resources.   This means cost-effective, fast and state-of-the-art Internet services can be provided fast with truly competitive network deployments.

WISPs are generally small and medium sized local companies, who as they grow, add jobs and facilitate advanced networks in areas where other providers (mobile, cable, cellular) often will not go due to economic constraints and choices.  WISPs serve these areas even if they are small, geographically diverse, with less return and spread-out.

**Bernhardt Communications Company Supports Fixed Wireless Access to 3700-4700 MHz for Point-To-Point Licensed Service**

We highly support providing for additional spectrum in 3700-4200 MHz band especially for point-to-multipoint fixed wireless broadband because it meets a need now.  To this end, Bernhardt Communications Company supports the Petition in Docket Number RM-1791 which calls for essential and favorable steps to advance such service and lay the groundwork for providing vital services to a vast number of underserved Americans.

**Why Favor 3700-4200 MHz Spectrum for Fixed Rather than Mobile Wireless Offerings?**

This spectrum is already utilized by fixed broadband for Point-to-Point solutions (backhaul).  It can be effectively shared with the Satellite industry (FSS) and provide vast new fast resources.  This spectrum, unlike 5GHz and 2.4 GHz and other currently unlicensed spectrum would provide for low noise consistent solutions; and, the ability to provide up to gigabit speeds and beyond to residential and business clients.   3700-4200 MHz is a mid-range spectrum which can traverse distances and provide excellent opportunities for fixed networks to thrive and provide advanced services where large providers often stay away.

Mobile providers seem to advance that they need every available spectrum, yet they often shy away from population centers less than 50,000 in size and often stay away completely from small populations centers which they claim are economically infeasible. Mobile providers also already have much of the effective spectrum. The need is greatest here for fixed wireless offerings in 3700-4200 MHz

WISPs use economies of scale, lower cost equipment, smaller staffs, and trained personnel to make the best use of spectrum.  They adapt as needed even in difficult and diverse situations. They can deploy a network in weeks which would otherwise take up to years for other providers if they choose to provide services at all.  This spectrum is ideal for fixed wireless broadband multipoint deployments.  Why choose a more expensive, unlikely to deploy segment in favor of fixed wireless service providers who not only wants to deploy in underserved areas, but is ready and willing to do so and have a history of such deployments?

**3700-4200 MHz is an Excellent Choice for Fixed Broadband Licensed Service**

**Conclusion:**  All too often the news focuses on mobile solutions, which certainly have their place and purpose; but 3700-4200 MHz is ideally suited for fixed wireless, a solution which often surpasses the performance of mobile solutions and is ready for deployment rapidly.  By providing fixed wireless licensed Point-to-Multipoint access to 3700-4200 MHz Internet services will thrive in an affordable, rapidly deployed, and competitive way.

Bernhardt Communications Company is a company assists WISPs and fixed wireless providers in finding effective regulatory, operating and spectrum choices.  Based on the overwhelming majority of benefits offered to the public by allowing fixed wireless to gain access to licensed spectrum in 3700-4200 MHz, *we encourage the Commission to endorse and approve the Petition for Rulemaking to Amend and Modernize Part 25 and 101 of the Communications Rules to Authorize and Facilitate the Deployment of Licensed Point-to-Multipoint Fixed Wireless Broadband Service in 3700-4200 MHZ Band (RM-1191)*.

We thank you for your consideration.

**Richard Bernhardt**

Managing Director

Bernhardt Communications Company